

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

<b>UNITED STATES OF AMERICA,</b>	)	
	)	<b>Criminal Number:</b>
<b>v.</b>	)	
	)	<b>Violation: 18 U.S.C. § 371</b>
<b>GEORGE HIGGINBOTHAM,</b>	)	<b>(Conspiracy)</b>
	)	
<b>Defendant.</b>	)	
_____	)	

**CRIMINAL INFORMATION**

The Assistant Attorney General for the Criminal Division of the United States Department of Justice charges:

**COUNT ONE**  
**Conspiracy to Make False Statements to Banks**  
(18 U.S.C. § 371)

**The Conspiracy and its Objects**

1. From in or about April 2017 to in or about January 2018, in the District of Columbia and elsewhere, the defendant, GEORGE HIGGINBOTHAM, did knowingly conspire and agree with others, known and unknown, including Co-conspirator A and Co-conspirator B, to knowingly make false statements for the purpose of influencing federally insured financial institutions upon any application, in violation of Title 18, United States Code, Section 1014.

**Acts in Furtherance of the Conspiracy**

2. In furtherance of the conspiracy and to effect the object thereof, the defendant and other members of the conspiracy, performed or caused the performance of the following overt act, among others not described herein, in the District of Columbia and elsewhere: on or about November 6, 2017, for the purpose of influencing Financial Institution Y's due diligence in

connection with applications for recently opened accounts under the control of Co-conspirator A, the defendant, at the request of Co-conspirator A, transmitted an email to Financial Institution Y that falsely represented the source and purpose of tens of millions of dollars in funds that originated with foreign accounts under the control of Co-conspirator B.

All in violation of Title 18, United States Code, Section 371.

**FORFEITURE ALLEGATION**  
18 U.S.C. § 981(a)(1)(C); 28 U.S.C. § 2461

3. The allegations contained in Paragraphs 1 and 2 of this Information are hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, 2461(c).

4. Upon conviction of the offense in violation of Title 18, United States Code, Section 371 set forth in Count One of this Information, the defendant, GEORGE HIGGINBOTHAM, shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the offense. The property to be forfeited includes, but is not limited to, a money judgment in a sum equal to the total value of the property subject to forfeiture.

5. If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or

e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

All pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

ANNALOU TIROL  
Acting Chief  
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